

Testimony Summary – House Committee on Homeland Security
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“Protecting Our Commerce: Enhancing the Security of America’s
Ports and Inland Waterways”

March 22, 2005 – Vicksburg, Mississippi

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Security is a process – not an end. I am honored to speak on security issues for the inland river system, an integral part of our country’s economy. I have chosen to write in the first person and to speak from my own port security experience. We were already presenting seminars on port security as early as January 2000 and by “we” I mean a cooperative effort with participation from the U.S. Coast Guard, the USDOT Maritime Administration with additional cooperation from the FBI and representatives from the Justice Department (Alcohol, Tobacco and Firearms). I have attempted to make six points in my verbal remarks. Here I present an expansion of those observations.

- (1) RECENT INSPECTOR GENERAL AUDITS OF PORT SECURITY GRANTS:
There is reason to suspect that some, repeat some, grant awards were based on politics rather than risk. If not true, the impression is understandable. DOT/ Maritime Administration and the Coast Guard worked in the field to identify ports of greatest concern and concurrent corrective action. As TSA made the grant awards, only 4% of the total dollars went to the 300 + inland ports, which handle 1.3 billion ton miles of the nation’s waterborne cargo with 72% of that cargo traveling on the tributaries of the Mississippi River. Those that scoff at the risk/vulnerability relationship of an inland port should remember that Oklahoma City was never identified as a prime terrorist target. The clusters of refineries and chemical plants along our inland rivers are tempting targets indeed. We know it and al Quaida knows it.

The audit actually reported, “the program has not yet achieved its intended results in the form of actual improvements in port security.” Ninety-five percent of all international commerce enters the United States through the 350 ports but 80% moves through only 10 ports. That makes those ten particularly attractive targets – damage could cause many deaths, injuries and seriously disrupt the flow of goods and by extension our entire economy. The inspector general found that the Department of Homeland Security appeared to be intentionally distributing the money as widely as possible – hence the term “pork security”. An analysis will reveal a need for broad assistance to many ports, large and small and further that a fundamental doctrine of anti-terrorism is hardened targets invite strikes against more vulnerable one.

For example, the audit criticized grants awarded to St. Croix (were they aware that as many as 80,000 passengers a week ply the Virgin Islands? Protecting people is a priority too). They criticized an award to Everett, Mass. – home to one of the country's most important liquefied natural gas facilities – and near a major metropolitan area besides. Furthermore, any weapon of mass destruction smuggled in through a small port could as easily paralyze U.S. economic activity as one brought into a large port.

(Reference: *New York Times* February 20, 2005 and *Port Security News Service*, March 3, 2005)

- (2) CONTAINER TRACKING: Important of course and not to be minimized. But let's remember that the USS Cole was not attacked by a container! A more likely scenario is a small suicide craft determined to block, for example, the Beaumont Ship Channel – narrow, vulnerable, potentially toxic, and the 4th busiest port in the United States. The locks are a weak link in our transportation chain, too, and any failure could precipitate economic chaos and critical shortages - and there are other such vulnerable locations throughout the system. Such tempting targets – and not one is in a container.

The fourth leading port in terms of tonnage in 2002, (with 85.9 million short tons of foreign and domestic shipments), is rarely recognized Beaumont, Texas, also the home of one of our National Defense Reserve Fleets, miles of pipelines and is one of the top military deployment ports. The narrow channel's vulnerability is analogous to that of a BB stuck in the sand of an hourglass – nothing can get through until it is un-jammed. And then there are the locks above St. Louis and along the navigable tributaries. A lock shut-down, (whether by knowledgeable terrorists, accident or lock failure) jeopardizes our grain exports, fuel shipments, power plant supplies and other critical components of the economy. Attempts to direct marine freight to other modes will fail because of congestion. Few recognize that Huntington, West Virginia, an inland port on the Ohio, handles 80 million short tons a year – much of it in petroleum and coal. Let's don't deny that shutting off power supplies, petroleum products and our entire economy is as simple as a well-placed suicide boat on a mission or even underwater infiltration and concurrent detonation. We still don't know how to differentiate that one lethal craft from the everyday flotilla of pleasure boats plying every river in this country. The enormity of our responsibility for port security extends from our coasts and up every navigable river throughout the system.

There are surely many dedicated capable professionals working to solve the problems associated with multiple container screenings at ports already backlogged. Supply chain safety has to be an essential element of our homeland security plan but is beyond the scope and experience of IRPT.

(Reference: *The U.S. Waterway System – Transportation Facts*, Navigation Data Center, U.S. Army Corps of Engineers)

- (3) PROOF OF CONCEPT: In the beginning of the Port Security Grant program, there was a small window opened to creative, imaginative solutions – which could be tested and, if successful, universally replicated – that door was slammed shut – no public reason given. Limited funding demands that new ideas be considered and tested. IRPT received such a grant and was able to provide threat analyses and employee education at fifty-nine ports and terminals along the inland river system that handled cargoes of concern at less than \$10,000 each. What a bang for the buck!

IRPT was able to complete threat assessments at 59 ports and terminals within a one year time frame. They were selected by the various USCG Captains of the Port as warranting special attention because they handled cargoes of concern. A summary of our findings, with appendices, is made a part of this report to the House Homeland Security Committee. The individual findings were provided to each port/terminal with copies forwarded to the Maritime Administration, USCG and the Transportation Security Administration. No, not all of the 59 were members of our association – our criteria were USCG identified ports/terminals.

None of this public service would have been possible had it not been for the Proof of Concept provision in Round I of the Port Security Grant Program. When this provision was severed without public explanation, then small, replicable and universally applicable solutions were also severed and the grant money was seemingly tied to hardware at specific ports – and in some cases to private for-profit property contiguous to a river or port. Yes, IRPT applied again with ideas that could have solved problems shared by many ports (communications interoperability, a port recovery plan, additional threat assessments, etc.) but was rejected since there was no longer a proof-of-concept provision and IRPT, of course, was not a port *per se*. It may have been that the need for “hardware” should have had priority, but in these later stages the need for innovation seems apparent.

- (4) FOCUS ON TECHNOLOGY: Technology is only part of the answer – but has been extolled by some as the solution to all of our security problems – but can also be outdated even before installation is complete. There has been a surge of so-called experts willing to provide technical answers for a price - the price often beyond the reach of smaller ports handling difficult cargoes. More emphasis needs to be put on “people aspects” – training eyes and ears. Our own people are our greatest resource.

I’ve been to meetings and heard presentations on all sorts of new technologies – surveillance, bio-identification, container tracking and more. But while effective and necessary, these are also expensive and beyond the reach of many of the smaller ports - even though they may handle very hazardous cargo. There seems to be little public

discussion paid to technology to protect the ports from waterside infiltration. Hopefully, technology is in the developmental stage for this particular area of vulnerability.

The point is that the training of our waterside hourly employees seems to have been somewhat overlooked. Suspicious activity is now reported to the Coast Guard and that reporting is appreciated – but requires many man hours to investigate. Part of the problem has to be that some of those reporting “suspicious activity” have not been trained in the identification of anomalies and are unable to differentiate the real threat from the phantom threat. Whether training a high school drop-out receptionist to deal with a bomb threat to the fork-lift operator reporting a person of interest, our people are our eyes and ears, but their observation skills may need honing. How many times has each of us been the victim of an expensive technological glitch? Our workers need education on terrorism awareness and are hungry for it, (see their comments incorporated into the final ITPT report attached).

- (5) STAKEHOLDER INVOLVEMENT: Security “solutions” have often been imposed from the top down, often with mandates. We need more public/private cooperative partnerships like the WRAMS (Western Rivers Area Marine Security). It is working in partnership that will strengthen our country from the water up. Since 9/11 there seems to have been more cooperation and sharing of information among the various federal agencies and with the private sector. Supporting that continued cooperation should be a priority.

Yes, the WRAMS is an excellent start. It is interesting and rewarding to participate in the fluctuating dynamics of discussion from totally different perspectives. I am convinced the recommendations evolving from WRAMS are stronger and more effective than any of the participants could generate alone. Even more public / private partnerships should be encouraged- perhaps along the lines of our harbor-safety committees.

At the Transportation Research Board Marine Technology Committee Conference last November there were presentations made on cutting edge technologies – all very impressive and all out of reach. Both the stakeholder panel and audience response, (the speaker left before hearing the stakeholder response or answering any questions), was a litany of low-tech requests for assistance – such as a call-in number for guidance since templates really serve no purpose in developing vessel and security plans. They wanted to understand the relationships among risk, vulnerability and threat-and wanted that understanding related to the requirements of their own security plans. Some of the ports have seemed definitely doomed to overkill.

- (6) RECOVERY EFFORTS: There has been little public attention paid to port recovery – whether from terrorism, accident or nature. The Maritime Administration has a proven track record from efforts in Honduras and Nicaragua following the devastation from Hurricane Mitch – couldn't we tap into that expertise and develop functional recovery plans?

I have been told that the hesitancy in developing port recovery plans is tied to a public relations concern that there would be a panic reaction to “preparing for the worst”. Maybe so. Nevertheless, we saw what happens to freight movement and passenger congestion when an accident blocked traffic at the Port of New Orleans for a few days – and that disruption was minimal with no infrastructure damage. I think we need to confront the possibility of port shutdown due to terrorism or nature. Various governmental agencies have their own plans in place but I am unaware of a comprehensive, multi-jurisdictional, multi-agency cooperative plan.

When Hurricane Mitch devastated Honduras and Nicaragua, the Maritime Administration, National Oceanic and Atmospheric Administration, the US Army Corps of Engineers, FEMA and other federal agencies worked together to re-develop the ports. They learned many lessons that could be applied, extrapolated and enhanced into recovery plans for our ports. Advances in technology could provide a multi-layered set of action plans covering almost every contingency.

In summary, I believe there needs to be less rigidity in the application of the Port Security Grant Program – and the recommendations of the USCG/MARAD teams need to be incorporated into any such award. We have to continue exploring technological options and at the same time we need to better use our people on site. We can do so by listening, respecting and educating. The encouragement of more public/private partnerships (like WRAMS) striving to develop individual solutions as opposed to imposed mandates could cut the expenses for the Department of Homeland Security, the taxpayers and the ports themselves. All of us need to face reality and develop recovery plans together.

Final Report for:

Inland Rivers, Ports and Terminals, Inc. - Preliminary Port Facility Assessments per Requirement of DTMA1G02028

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Port Security Grants, Round 1, Proof of Concept: June 17, 2002-September 30, 2003

REPORT OVERVIEW

Introduction
Project Objectives
Process
Project Results
General Observations
Implications for Port Security
Further Actions
Appendices

INTRODUCTION

The 303 inland river ports and 1,800 shallow draft terminals are of national economic and strategic importance, representing \$1.5 trillion in cargo and 13 million jobs that generate \$500 billion in personal income. They move numerous products and military materiel vital to U.S. economic interests.

Inland Rivers, Ports and Terminals, Inc., has been the industry's professional association since 1974. The Board of Directors and general membership voted to allow IRPT to negotiate and serve as fiscal agent for this grant. The actual security assessments and employee education presentations were subcontracted by IRPT.

PROJECT OBJECTIVES

Proof of Concept

Security risk assessments were to be completed on selected inland port infrastructure systems including personnel training, physical and technical analysis and operational considerations.

- Complete risk assessments at inland river ports and terminals that handle cargoes of concern
- Identify security risks unique to each port
- Determine the effectiveness of the security protection system currently in place at each port

- Initiate employee training in identification and reporting of observed anomalies
- Complete modified generic port fault tree for all ports assessed
- Identify possible corrective actions for each port assessed

Project Objectives – Success

Per the commitments made in the grant application, the assessment and training approaches developed and applied by Inland Rivers, Ports and Terminals, Inc., are replicable, quantified, standardized, accountable, traceable, consistent in terminology, and defensible.

- Risk assessments were completed at 59 inland river ports and terminals that were identified and prioritized by USCG as handling cargoes of concern. They are listed in Appendix A with their completion dates.
- Blind evaluations by facilities managers of the process were returned to the IRPT offices and a collation of those ratings has been made a part of this report as Appendix B.
- A list of all of the “positives” uncovered at the various facilities has been made a part of this report as Appendix C.
- A list of all of the “negatives” uncovered at the various facilities has been made a part of this report as Appendix D.
- Employee training was implemented with 212 employees attending, with course evaluations completed by most of them. A summary of their evaluations is enclosed as Appendix E.
- Security recommendations for each port were developed and prioritized.

PROCESS

Pre-Assessment

This was a new endeavor and had to meet all commitments made in the proposal, comply with procurement requirements, incorporate the input from the IRPT officers and provide guidance and insight to the facilities assessed. Concurrently it had to be flexible to incorporate any agreed upon changes requested by the granting agencies or by IRPT.

- Advertised nationally for Statements of Interest and Qualifications.
- Developed Request for Proposals.
- Forwarded Request for Proposals to all who had responded to request for statement of I & Q and all others who requested it (total 14).
- Preliminary screening undertaken utilizing responsiveness to request and qualifications of principals as criteria.
- Responses reviewed by IRPT Executive Committee and Chairman, IRPT Security Committee.
- Contract award ranking determined at IRPT Board meeting September 4, 2003.
- Contractor references verified.
- Contract awarded and subsequently negotiated. Biographical information on the consultants is included as Appendix F.
- Assessment procedures and employee curriculum developed.
- System test scheduled for October 16, 2003 at Port Bienville, MS.

- Invitations to observe/participate/critique initial assessment issued to USCG, USACOE, MARAD.
- Preliminary assessment undertaken and systems for management feedback and training evaluations refined.
- USCG Captains of the Ports contacted through District 8 Headquarters to request their selection of ports to be prioritized for assessments.
- Scheduling port assessments begun and continued through June, 2003.
- Initial scheduling packets forwarded to each port director to confirm verbal scheduling commitments -- packets included an overview of the grant specifications, biographical information on the consultants, and a copy of the *USCG Facility Security Planning Guide* for their initial use.
- Individual visits made to each identified facility to review the responses to the *Facility Guide* and follow through with the assessment process.
- Assessments implemented beginning December 10, 2002.

Problems Identified

During the course of the project, numerous problems surfaced. Guidance was requested from MARAD and/or USCG. Problem statements were forwarded to them with requests for suggestions or direction.

- Scheduling the assessments was extremely difficult and took much longer than anticipated.
- The *Inland River Guide* and the *Journal of Waterborne Commerce Statistics* were used to assist in the identification of facilities handling cargoes of concern. Some of that information was dated or erroneous.
- Many national companies would not participate because of their perceived exposure to subsequent litigation.
- Some employees were not available for training for various reasons and the training was requested on video.
- There was a nebulous definition of what constituted a public port/terminal.
- USCG requested that several Texas ports be assessed that did not meet the criteria for "inland" port but are considered as part of the inland water transportation corridor.
- Access to the USCG security assessment format identified as PISRAT 2.0 was lacking.
 - In some instances, terminals handling CDCs (Certain Dangerous Cargoes) were unwilling to provide details regarding product amounts handled or stored, citing "proprietary information."

Resolutions Incorporated

A combination of email, telephone responses and personal contact yielded constructive solutions to many of the problems identified which impacted completion of the project.

- Scheduling: Began scheduling process sixty days out and adjusted time-spent estimates per port/terminal accordingly.

- Data: Recognized that some cargo data was erroneous. As one response replied, "the only consolation has been, is, and will be, that some data are better than none."
- Declination: Proceeded without including any facility that declined assessment. One response to IRPT stated, "Those who did not choose to participate in Round I will want to get in later."
- Video Training: Generated bids to produce a training video but had no suitable budget category in the grant for implementation.
- Public Port: Agreed upon an operational definition that a private terminal is closed to common carriage and is so located that a terrorist incident would not affect the public at large. The exception to that definition would be if a port or terminal was such that its disruption would have an adverse effect upon the commerce of the United States.
- IRPT assessed the additional quasi-bluewater ports as requested by the Captains of the Ports.
- PISRAT 2.0: Access was requested to enable those undertaking the IRPT threat assessment process to adjust the reporting format as necessary to comply with the specifications of NVIC 11-02. After several discussions, IRPT operated from the assumption that the reporting format did comply with those requirements and proceeded accordingly.

PROJECT RESULTS

At the conclusion of the project, the identified inland river ports had assessments completed and available employees had been trained in various aspects of terrorism recognition and intervention. Effectiveness of the security protection system currently in place and recommendations for improvement were presented at management de-briefings at the conclusion of each visit. Written reports for the facility directors followed shortly thereafter.

- Summaries of vulnerabilities and strengths are included in the appendices attached.
- Printed and CD-ROM reports for each port/terminal were forwarded to MARAD throughout the year with copies provided for distribution to USCG and TSA.
- Photographs of each port/terminal indicating areas of concern were included in the CD-ROM transmittals.
- Printed copies of each report, with pictures, were provided to MARAD with a copy retained by IRPT.
- Employees who participated in the training provided comments such as "very good and timely information" and "trainers very knowledgeable of the subject." Additional comments are a part of Appendix E.
- A CD-ROM of the training offered to port and terminal employees has been made a part of this report.
- The assessments were of great assistance to the facilities since they were deemed to provide what was necessary to comply with NVIC 11-02.
- The assessments often provided the basis for subsequent security enhancement requests from either TSA or individual port commissions.

- Port directors and terminal managers who forwarded their evaluations of the process were universally positive, as seen in Appendix B.
- Copies of the assessment reports were forwarded to each facility director via certified mail, return receipt requested.
- Law enforcement personnel and facility security officers attending the training sessions requested copies of the PowerPoint presentation "Terrorism Awareness" for use in their own training.

GENERAL OBSERVATIONS:

In completing the threat assessments and questioning/listening to staff and employees at the various ports, several factors appeared to be almost universally applicable.

- Generally speaking there is a lack of security awareness even at the facilities handling cargoes of concern.
- Facility directors were aware they needed security improvement and they were interested in making their facilities more secure but lacked knowledge of security issues and techniques.
- Facility directors generally had no concept of what makes a facility secure.
- There was little general awareness of NVIC requirements regarding facility operation even if the facility was handling dangerous cargo.
- There are many small ports in the inland river system that need attention but can't afford to implement security measures.

IMPLICATIONS FOR PORT SECURITY

The results of the IRPT Threat Assessment and Employee Education Project suggest some of the following implications:

- There needs to be a standardized plan and approach to address inconsistencies.
- There need to be standard definitions applied universally.
- There needs to be a better identification and tracking system for cargoes of concern.
- The river system needs to be viewed as a single entity rather than a series of discrete units.
- Port security should be developed on a regional basis.

FURTHER ACTIONS

Standardize the application of U.S. Coast Guard regulations for similar facilities which handle CDCs (Certain Dangerous Cargoes), such as those for operating a facility that handles ammonium nitrate fertilizer.

Example: One facility had open bays of ammonium nitrate (no locked doors); their front end loaders were parked nearby and accessible to anyone; there was no perimeter fence around the facility; the road leading to the facility was essentially a public road with no restriction to public access; there were no alarm systems and the area was poorly lit. The facility operator advised that the USCG inspected

them on a yearly basis. A second facility of similar size and location that handled ammonium nitrate was directed by the USCG to have a 24/7 presence at the facility. The facility hired additional staff to meet USCG requirements. The facility had closed and locked doors at the storage area, there was a perimeter fence around the facility and it was well lit.

Urea is a fertilizer found in many terminals serving the needs of the agricultural industry and those storage areas should be included in subsequent threat assessments.

Although not as easy to use as ammonium nitrate in the construction of a bomb, urea can be used in constructing a powerful explosive compound. The main explosive charge at the World Trade Center bombing of February 1993 was an improvised explosive device utilizing a urea base. The resulting blast produced a crater 150 feet in diameter and five floors deep. Section 841(d) of the United States Code (U.S.C.) and 27 CFR 55.23 refer to urea as an explosive material.

Certified courses of study on port security should be developed for facility directors and managers and required as part of continuing education.

The balance of the smaller inland ports should be assessed and guidance provided to the directors for increased security enhancement.

A standard protocol should be developed for certification of security assessments performed in the private sector to ensure that they meet U.S. Coast Guard specifications.

APPENDIX A – PORTS & TERMINALS ASSESSED

Port	Terminals	Assessment Date
Alabama		
Florence – Lauderdale County Port Authority James Lowe – Exec. Dir. P. O. Box 1169 Florence, AL 35631	Tennessee Southern Railroad American Metal Chemical Corp. Muscles Shoals Marine Service, Inc. F&L Sand & Gravel (Rudolph Marine & Salvage L.L.C.) Roberson Scrap Works Lauderdale (Alabama) Farmers Coop Royster Clark	Apr 23-24, 2003
Arkansas		
Port of Little Rock Paul Latture – Exec. Dir. 7500 Lindsey Road Little Rock, AR 72206	Logistics Services, Inc.	Feb 5-7, 2003
Yellow Bend Port Authority Kenny Gober – Exec. Dir. P. O. Drawer 725 McGehee, AR 71654	Oakley Port of Yellow Bend	Feb 2, 2003
Miller's Bluff Port Cross Oil Terminal Charles Clark - Manager 484 East 6th St. Smackover, AR 71762	Cross Oil Terminal	Feb 3-4, 2003
Louisiana		
Alexandria Regional Port John Marzullo – Exec. Dir. P. O. Box 628 Alexandria, LA 71303	Terral River Services	Jan 15-16, 2003

APPENDIX A - continued

Port	Terminals	Assessment Date
Louisiana		
Port of Shreveport – Bossier John W. Holt – Exec. Dir. P. O. Box 52071 Shreveport, LA 71135	Oakley Louisiana, Inc. Red River Terminals Davison Terminal Services Omni Specialty Packaging Southern Composite Yachts, Inc Blount Brothers Construction	Jan 12-15, 2003
Mississippi		
Port of Aberdeen Perry Lucas – Port Dir. 125 West Commerce Aberdeen, MS 39730	Tom Soya Grain Company Taylor Gas Liquids Pearson Technologies, Inc	Apr 21-22, 2003
Greenville Port Commission Harold Burdine – Port Dir. P. O. Box 446 Greenville, MS 38701	Greenville Port Terminal	May 27-28, 2003
Hancock County Harbor & Port Commission Hal Walters – Port Dir. P. O. Box 2267 Bay St. Louis, MS 39521	Linea Peninsular Stevedoring Services of America Wellman, Inc	Oct 15-16, 2002
Natchez – Adams County Port Commission Pat Murphy – Port Dir. P. O. Box 925 Natchez, MS 39121	Natchez Port Terminal Davison Terminal	Jan 7-8, 2003
Warren County Port Commission Jimmy Heidel – Port Dir. P. O. Box 709 Vicksburg, MS 39181	Kinder Morgan	Nov 18-20, 2003
Yazoo County Port Authority Gerald P. Fraiser – Port Dir. P. O. Box 172 Yazoo City, MS 39194	MissChem Nitrogen	Jan 6-7, 2003

APPENDIX A – continued

Port	Terminals	Assessment Date
Missouri		
Howard/Cooper County Regional Port Authority Paul Davis - Operator 609 Main Street Boonville, MO 65233	Interstate Marine	Apr 10-11, 2003
Kansas City Port Authority (Midwest Terminal) David Griffin – Vice President For Operations 1851 Woodswether Rd Kansas City, MO 64105	Midwest Terminal	Apr 7-8, 2003
New Madrid County Port Authority Timmie Lynn Hunter – Exec. Dir. 435 Main Street New Madrid, MO 63869	St. Jude/New Madrid Fleeting Service	June 1-2, 2003
Pemiscot County Port Authority David Madison – Exec. Dir. 619 Ward Avenue Caruthersville, MO 63830	Trinity Marine Products	June 3-5, 2003
Southeast Missouri Regional Port Authority Dan Overby – Director 2110 Main Street Scott City, MO 63780	Girardeau Stevedores Contractors First Missouri Terminals	May 29 – June 2 2003
Oklahoma		
Muskogee City – County Port Authority Scott Robinson – Dir. 4901 Harold Scoggins Dr. Muskogee, OK 74403	Muskogee City Water Plant Koch Materials Company Johnston Enterprises Fansteel Specialty Metals Quality Liquid Feed, Inc Consolidated Grain & Barge	Feb 20-22, 2003

APPENDIX A - continued

Port	Terminals	Assessment Date
Oklahoma		
Tulsa Port of Catoosa Dick Voth – Director 5350 Cimarron Road Catoosa, OK 74015	Brenntag Southwest, Inc Terra Nitrogen Southern Missouri Oil Company Inc Safety-Kleen Corp Catoosa Fertilizer Company Frontier Terminal & Trading Company	Feb 17-20, 2003
Pennsylvania		
Pittsburgh Port Comm. James McCarville – Ex. Dir. 425 Sixth Avenue Suite 2990 Pittsburgh, PA 15219	Neville Chemical Company U.S. Steel, Clairton Works Eastman Chemical, Jefferson Plant Freeport Terminals Inc Industrial Terminal	Dec 9-18, 2003
Tennessee		
Port of Chattanooga (J I T Terminal) John Bennett – Manager P. O. Box 4800 530 Manufacturers Road Chattanooga, TN 37405	J I T Terminal	May 7-8, 2003
Texas		
Port of Brownsville Raul B. Besteiro – Dir. 1000 Foust Road Brownsville, TX 78521	Austin Star Detonator CITGO INTERLUBE RTW Terminals TransMontaigne Product Services Inc	Jan 29-31, 2003
Port Isabel – San Benito Navigation District Robert Cornelison – Dir. 250 Industrial Drive Port Isabel, TX 78578	Port Isabel	Mar 24-25, 2003
Victoria County Navigation District Howard Hawthorne – Exec. Dir. P. O. Box 2760 Victoria, TX 77902	Equalizer, Inc	Jan 28-29, 2003

APPENDIX B – FACILITY MANAGEMENT EVALUATIONS

The form for the Port Management Evaluation of Threat Assessment and Employee Training is handed to port management by the consultants to be forwarded directly to IRPT. Thus anonymity is protected.

14 Total Returns

(1) Did the persons conducting the Threat Assessment and Employee Training act in a professional manner while conducting the assessment?

Yes 14

Comments:

Very professional.

Very much so.

Both men did an excellent job. We had nine people attend the training and they were very pleased with the information provided.

On time. Required expertise. Good communication skills. Took time to explain. Gave detailed outbriefing.

Very knowledgeable and conducted themselves in a very professional manner.

(2) Were they friendly and courteous to port and facility employees?

Yes 14

They put everyone at ease.

Yes and to neighboring companies visited as part of the assessment.

They put everyone at ease.

(3) Were they on time for appointments and meetings?

Yes 14

They were early due to air travel, no problem.

Yes, both days. Kept me advised.

Never a problem.

Early due to air travel, no problem.

(4) Did they answer your questions on port and facility to your satisfaction?

Yes 14

They provided some very valuable insight to the problem at hand.

Very Good information.

They answered the questions to my satisfaction.

APPENDIX B - continued

Questions were encouraged and answered.
Very knowledgeable.
They were informative and offered good suggestions.
All questions were answered.

(5) Other comments

This was a long trip with poor connections from Mississippi.
I greatly appreciated the help.
Excellent and professional in all aspects.
They did a wonderful job on the assessment as well as the training session.
Both possess excellent communication skills. Our crew members were attentive and interested throughout the training session.
They gave me all the information I requested and agreed to send additional information.
I believe they are doing an excellent job for IRPT.
I do not understand why type and amount of product flowing through the port are not factors included/considered as a part of vulnerability/threat assessment.
Very informative and worthwhile.
We were very pleased with the professionalism. The training and assessments provided by them will be of value in completing our port security plan.
We appreciate IRPT selecting our facility to receive the benefit of this service.
Excellent and professional in all aspects.
Very helpful in guiding us in the right direction on our security needs.
We had already made some assessments on our own and they agreed with our comments and expanded in some areas where we were lacking.
They also were very cooperative with our tenants and answered all questions posed to them.
Very good information. They answered the questions to my satisfaction.
Some of the information provided is now being used as part of our security procedures.

APPENDIX C – POSITIVE FINDINGS

Emergency Preparedness

- The Port has established a Port Security Committee, which will complete Port Security Plan security enhancements.
- The Port has an excellent emergency communications system to notify and update tenants of an emergency in the Port.
- Liaison with community groups, law enforcement and public safety offices are excellent.
- The U. S. Coast Guard required Port and Facility Security Plans were discussed and the initial draft of the Port's Security was reviewed with management during the assessment.
- The Port has in place Emergency Response Plans including Threatening Communications (Bomb Threats), Workplace Violence and Criminal Incident Response Plans.

Physical Security & Access Control

- Terminal's good housekeeping practices demonstrate attention to the facility and it provides a passive security deterrent.
- Vehicle access to the facility is controlled by card access.
- The facility has an excellent perimeter fence.
- The truck loading rack is located within the fenced secure area.
- The truck rack is operated by the same card access system used at Red River Terminal.
- The tank farm is secured with a perimeter fence.
- The facility is well lighted.
- The perimeter fence line is well maintained.
- Visitors sign in and are issued badges.
- Port tenants have adequate perimeter fencing and lighting.
- The Port has identified and is considering several access control security improvements.
- The Port office is alarmed.
- Proper signage directing visitors to the office and/or security procedures.
- The property is legally posted including land side and waterside for possible trespassing prosecution.
- The receptionist has a panic alarm.

Human Resources

- Employee security awareness is at the appropriate level.
- Facility has a drug and alcohol policy.
- Two-man company driver teams make truck shipments of product.
- Background investigations are conducted on new employees of the Port.
- Port has its own security guard service.
- Facilities within the Port have their own security guard services.

APPENDIX C - continued

Physical Location

- Located in a developed end of the property within sight of a Sheriff's Deputy's residence.
- Facility handling explosives is remotely located in the Port with a large buffer zone from other port tenants.
- Former employee lives near entrance to Port located in rural area.
- Current employee lives on Port property.

Other

- Facility has a recent history of minimal or no security incidents.
- Portable equipment and materials are secured after hours.
- The Port has a State Police Water Patrol craft moored in the Port.

APPENDIX D – NEGATIVE FINDINGS

Emergency Preparedness

- General lack of awareness of U. S. Coast Guard NVICs (Navigation and Vessel Inspection Circulars) requirements for certain ports and facilities.
- Lack of liaison with local Emergency Response organizations and lack of emergency response plans.
- The Port has no Emergency Response Plans.
- Emergency Response Plans do not include security subjects such as: threatening communications, bomb search plans, workplace violence or employee security awareness training.
- The Port lacks a Threatening Communications Response Plan.
- The Port has not established a Port Security Committee.
- The Port has no emergency communications system to notify and update tenants of an emergency in the Port.
- Liaison with community groups, law enforcement and public safety offices needs improvement.

Physical Security & Access Control

- The facility does not have a perimeter fence.
- A portion of the facility is unfenced.
- In some instances, tenant perimeter fencing is inadequate.
- There is no formal access control system.
- There are multiple uncontrolled public ingress/egress routes.
- Public access to the levee road, barge channel and turning basin is unrestricted.
- The current Closed Circuit Television system (CCTV) does not include recording outgoing traffic.
- The facility does not have an intrusion detection system.
- Public road and railroad right-of-way are access points for undetected intrusion.
- Trucks waiting to load are allowed to park adjacent to an unattended ammonium nitrate facility after hours.
- The truck rack is unsecured and is accessible to the public via the port's unsecured public road.
- Truck drivers park in the immediate area at night awaiting early morning loading.
- Facility lighting is minimal in the tank farm and employee parking lot.
- There is no CCTV coverage of the unmanned truck rack or the office where the operating computers are located.

APPENDIX D - continued

- The facility is unattended between 11:00 p.m. and 5:00 a.m.
- Fencing does not segregate the employee parking lot, truck loading/unloading areas and the tank farm.
- Key control of the two secured gates is compromised and proper gate locking procedures are not followed. The gates have been improperly locked, negating the tenant's lock 13 times in 7 months of operation.
- The facility shares a dock with other tenants and there is no CCTV coverage of the dock.
- The Port office is not alarmed.
- There is a significant volume of anticipated truck traffic, 50-70 trucks/day, with personal recognition as the accepted access control method.
- There is a lack of signage directing visitors to the office and/or security procedures.
- The property is no legal posting of the property, either land side or waterside for possible trespassing prosecution.
- There is a high volume of seasonal truck traffic.
- There is public access to the Port 24 hours a day.
- There is no electronic monitoring of vehicle traffic at the ingress/egress gate or within the Port area.
- There is no after-hours surveillance of an ammonium nitrate facility's wharf or fleeting areas.
- An unfenced ammonium nitrate facility is located on a publicly accessible road with open loading bays and loading equipment parked nearby.
- Public tours of the Port are promoted with minimal oversight.
- There is unrestricted access to the Port Offices via the rear entrance.
- The receptionist does not have a panic alarm.
- There is no telephone record capability for the primary telephone operator at the Port's office.

Human Resources

- The Port or facility does not have an alcohol and drug policy.
- The Port or facility does not conduct background investigations on new employees.
- Port does not have a security guard service.
- Critical facilities within the Port do not have their own security guard services.

Physical Location

- Barge fleeting operations extend to remote area of the waterway.
- The Port or facility is located in a high crime area.
- Port or facility location is remote with little law enforcement patrol presence.

APPENDIX D - continued

Other

- There is a City-County Park located within the Port's property.
- There is no regular water patrol of the Turning Basin.
- A Port Museum is included in the same building with the Port offices.
- Facility has regular criminal incidents.
- Port or terminal's housekeeping practices need improvement.

APPENDIX E – Employee Training
July 8, 2003

IRPT Threat Assessment/Employee Education Project
Seminar Evaluations

Total Responses 24

*Cumulative 151 (Includes numbers from February 21, 2003 report)

5 = high 1 = low

a. The instructor organized material effectively.

5: 18 = 75% 4: 5 = 21% 3: 1 = 4%

Cum. (151) 110 = 73% 38 = 25% 4 = 2%

b. The instructor was knowledgeable of subject matter.

5: 20 = 87% 4: 2 = 9% 3: 1 = 4%

Cum. (153) 128 = 84% 22 = 14% 3 = 2%

c. The instructor presented information clearly and at a proper pace.

5: 15 = 65% 4: 8 = 33% 3: 1 = 4%

Cum. (149) 105 = 70% 40 = 27% 5 = 3%

d. The length of the course was appropriate.

5: 7 = 29% 4: 12 = 50% 3: 4 = 17% 2: 1 = 4%

Cum. (146) 93 = 64% 46 = 32% 8 = 5% 1 = .1%

e. Course goals were met.

5: 11 = 46% 4: 8 = 33% 3: 4 = 17% 2: 1 = 4%

Cum. (154) 84 = 55% 57 = 37% 13 = 8% 1 = .1%

f. Overall how was this in meeting your expectations?

5: 9 = 38% 4: 11 = 46% 3: 3 = 13% 1: 1 = 4%

Cum. (154) 74 = 48% 63 = 41% 14 = 9% 2: 2 = 1.3% 1: 2 = 1.3%

APPENDIX E - continued

Comments:

I felt that more time could have been given toward recognizing potential terrorist activity. Security measures that can help to prevent terrorist acts or surveillance.

Thank you for including Connors in the seminar.

Very informative.

Good program.

Appreciate being part of the presentation.

Enjoyed it.

Very informative. (2)

Job well done!

Good basic information.

Pass out material before starting.

Pass on current news information, give audience "inside information" or what they believe is inside information. Stirs interest and involvement.

More info on previous terrorist attacks.

Details that tie all this into our everyday jobs/situations.

Good awakening to possibilities.

Needs to be a bit longer.

Very informative.

Very good.

Added July 8

More instruction on developing emergency plans.

Was a good class.

Hand out more reading material.

Very informative.

Have meetings on a regular basis to inform us of latest strategy and information available.

I feel a couple more hours would be beneficial.

The instructor had too many "uhs".

Mr. Rollins seems to be very knowledgeable and interesting.

Everything was very good. I like the way everything went.

Good job, very informative.

Get Coast Guard more involved.

Good course.

The information was practical and presented to where we can use it at our facilities.

Great job.

Exceeded meeting expectations.

APPENDIX F – BIOGRAPHICAL INFORMATION

CISR, L.L.C. – John D. Gwin, President

As a Security Advisor for Exxon & ExxonMobil for 25 years, Gwin has conducted hundreds of risk/threat assessments involving inland waterway terminals, refinery/chemical plants, marketing (fuel) terminals, production facilities, pipeline operations and retail service stations. During the same period, he was responsible for conducting investigations on behalf of the corporation involving violations of corporate policy and/or criminal law. Gwin was a Special Agent of the FBI for five years prior to joining Exxon and a Battery Commander in the United States Army.

Prior to retirement in 2001, Gwin's portfolio included 23 ExxonMobil U.S. manufacturing sites (refineries/chemical plants). He conducted threat assessments at these sites using Department of Energy Risk Assessment methodology. Gwin has attended numerous training programs sponsored by the American Society for Industrial Security pertaining to physical security and assessment techniques.

Gwin has participated in the development and presentation of security programs regarding: response plans for bomb threats and workplace violence, terrorist threats, substance abuse in the workplace, potential labor violence and other criminal activity such as armed robbery and kidnapping prevention.

Rollins & Associates, Inc. – E. Avery Rollins, President

In an FBI career that spanned 31 years, Rollins developed an expertise in Middle Eastern Terrorism and bombing matters. Early in his career, he completed a year of training in the Arabic language (Iraqi dialect) at the US Army Defense Language Institute after which he conducted terrorism investigations in New York City and Washington, D. C. In 1978 he completed training in Explosive Ordnance Demolition at the Hazardous Devices School, Redstone Arsenal. Thereafter, much of his work revolved around bombing matters related to domestic and international terrorism.

With the terrorist bombing of the Murrah Federal Building in Oklahoma City in April 1995, a building security committee was formed at the McCoy Federal Building in Jackson, MS. The committee was composed of representatives from each federal agency in the building, and representatives of local law enforcement. At the time Rollins was a Supervisory Special Agent with the FBI, supervising the Terrorism and Bombing Matters programs and was selected Building Security Committee Chair. The committee reviewed security procedures in place at the time, identified weaknesses in the program and made recommendations for improvements to the General Services Administration. He provided training in bomb threat, bomb response and building evacuation to federal employees.

After retirement from the FBI, Rollins began providing security consulting and investigative services to the private sector. In June 2002, Rollins completed a six-month project for the Mississippi Department of Transportation (MDOT). Rollins was contracted to conduct threat assessments and develop security plans for its three

APPENDIX F - continued

administrative offices, six district offices, and a representative number of its 113 smaller project offices around the state. Threat assessments, including nighttime security reviews, were conducted at 29 offices in Mississippi over the six-month period. The threat assessments included a physical site inspection, review of records and security procedures, and interviews of MDOT employees at each office. District office sites varied in size from 15 acres to over 60 acres. Findings, recommendations and specific security plans were prepared for the administrative and district offices while generic security plans were prepared for the smaller offices.

END OF REPORT